

**UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

vs.

**COLLINS MURPHY, LIMESTONE
COLLEGE, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA
LTD. d/b/a XHAMSTER.COM,**

Defendants.

Case No.: 7:20-cv-00947-TMC

MOTION TO AMEND COMPLAINT

Plaintiffs, Jane Does 1-9, by and through their undersigned counsel, respectfully moves this Court for leave to amend their Complaint pursuant to Rule 15(a)(2) of the Federal Rules of Civil Procedure. Specifically, Plaintiff requests leave to amend the pleadings to add one additional cause of action under 18 U.S.C. § 1962(c) and 1964(c).

This new cause of action was previously considered by Counsel for Plaintiffs, however, out of an abundance of caution it was not included in the initial pleadings as actions under 18 U.S.C. § 1962(c) and 1964(c) are delicate matters. Counsel for Plaintiffs have always anticipated receiving information through Discovery that would substantiate their beliefs such that they could amend to add the cause of action at a later date. That said, the recent publicity surrounding Defendants has given rise to the release of new information which substantiated Plaintiffs initial beliefs that such a cause of action is warranted in this case. As such, Plaintiffs now move to add this cause of action against Defendants.

A copy of the proposed Fourth Amended Complaint is attached hereto as Exhibit 1. In support of this Motion, Plaintiffs rely on their Memorandum in Support, the statements herein,

the pleadings filed in this case, the rules of Court and such other matters as may be properly presented to the Court.

In accordance with Local Civil Rule 7.02, Counsel for the Plaintiffs has conferred or attempted to confer with Counsel for the Defendants in good faith to resolve the matter contained in the motion, however, was unable to receive consent from Counsel for the Defendants.

WHEREFORE, the Plaintiffs respectfully request this Court enter an Order granting them leave to file their amended Complaint.

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Respectfully submitted,

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December 9, 2020